



Form ADV Part 2A

Disclosure Brochure  
Dated: March 4, 2021

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This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Ogorek Wealth Management, LLC (“OWM” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (716) 626-5000 or [tony@ogorek.com](mailto:tony@ogorek.com).

OWM is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about OWM is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for the Advisor’s firm name or by CRD# 105707. References herein to OWM as a “registered investment advisor” or any reference to being “registered” does not imply a certain level of skill or training.

## Item 2 Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

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## Item 4 Advisory Business

**A.** Ogorek Wealth Management, LLC (“OWM” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commissions (“SEC”). OWM is a limited liability company formed in November 2001 in the State of New York is owned by Anthony Ogorek.

**B.** OWM offers advisory services to individuals, families, business entities, retirement plans, trust, estates, charitable organizations and non-profit organizations (each as a “Client”) its investment advisory services and to the extent specifically requested by a Client, financial Planning and related consulting services.

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. OWM’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

OWM works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order develop an investment approach. OWM will then construct an investment portfolio, consisting of mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks and/or bonds to meet the needs of Clients.

OWM financial planning services begin with a coordinated financial plan. The financial plan will typically address the following areas:

**GOAL SETTING** | OWM documents a set of personalized financial objectives for each client through a series of open-ended questions and assessment tools.

**INVESTMENT PHILSOPHY** | OWM educates each client as to its basic tenets of portfolio management. OWM also presents each client with an initial analysis of his or her current portfolio.

**FINANCIAL INDEPENDENCE** | OWM creates long-term cash-flow projections, in order for each client to understand how much to save at the pre-retirement stage or how much can be spent each year if he or she is already financially independent. OWM creates multiple ‘what-if’ scenarios to make clients aware of how changes in the assumptions can impact their future financial security.

**INVESTMENT GUIDELINES AND RECOMMENDATIONS** | OWM dovetails a client’s investment plan with the client’s goals through written investment guidelines and specific investment recommendations unique to each client.

**RISK MANAGEMENT REVIEW** | OWM evaluates a client’s various insurance policies- from automobile to long-term care and life insurance. OWM will comment on the quality and cost of the existing coverage as well, and where necessary, make recommendations for termination or additional coverage.

**INCOME TAX REVIEW** | OWM will review each client’s income tax return and, in conjunction with the client’s CPA will make income tax planning recommendations.

**ESTATE PLANNING REVIEW** | OWM examines each client’s current estate plan to confirm it meets stated goals and family objectives. If changes are needed, we will work closely with the client’s estate planning attorney and accountant to implement these changes. If a client needs to engage an attorney or accountant, we will assist in selecting the appropriate professional.

**PORTFOLIO REPORTS**| Clients are “walked through” the format of the OWM quarter portfolio report. This ensures each client is familiar with the presentation of the information and has a chance to ask questions to fully understand

these reports.

**C.** Clients are generally required to enter into an Investment Management & Planning Agreement with OWM setting forth the term and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee paid by the Client for OWM's services, based on the schedule noted below in Item 5 – Fees and Compensation. OWM's annual investment advisory fee is based upon a percentage (%) of the market value of the assets placed under OWM's management. If requested by the Client, OWM may recommend the services of other professionals for implementation purposes. The Client is under no obligation to engage the services of any such recommended professional. The Client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from OWM. The Client may, at any time, impose reasonable restrictions, in writing, on OWM's services. OWM does not participate in a wrap fee program. Please Note: If the Client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the Client agrees to seek recourse exclusively from and against the engaged professional. Please Also Note: It remains the Client's responsibility to promptly notify OWM if there is ever any change in the Client's financial situation or investment objectives for the purpose of reviewing/evaluating/revising OWM previous recommendations and/or services.

**RETIREMENT PLAN ROLLOVERS** - A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If OWM recommends that a client roll over their retirement plan assets into an account to be managed by OWM, such a recommendation creates a conflict of interest if OWM will earn an advisory fee on the rolled over assets. As such, any investment recommendation that OWM makes is based on OWM's belief that the recommendation is in the Client's best interest.

**CLIENT OBLIGATIONS** - In performing its services, OWM shall not be required to verify any information received from the Client or from the Client's other professionals, and is expressly authorized to rely thereon. Moreover, each Client is advised that it remains the Client's responsibility to promptly notify OWM if there is ever any change in the Client's financial situation or investment objectives for the purpose of reviewing/evaluating/revising OWM's previous recommendations and/or services.

**DISCLOSURE STATEMENT** - A copy of this Form ADV2A ("Disclosure Brochure") and the applicable Form ADV2B ("Brochure Supplements") shall be provided to each Client prior to, or contemporaneously with, the execution of the Investment Management & Planning Agreement. Any Client who has not received a copy of OWM's written Disclosure Brochure at or prior to executing the Investment Management & Planning Agreement shall have five (5) business days subsequent to executing the agreement to terminate OWM's services without cost or penalty.

**D.** As of December 31, 2020, OWM had \$445,058,704 in assets, all of which are managed on a discretionary basis.

## Item 5 Fees and Compensation

**A.** The Client can determine to engage OWM to provide discretionary investment advisory services on a fee only basis.

### INVESTMENT ADVISORY SERVICES

If a Client determines to engage OWM to provide investment advisory services, OWM's annual investment advisory fee may be negotiable for larger accounts. Fees are paid quarterly in arrears, based upon the average daily balance of the account during the quarter. OWM's management fee schedule is as follows:

Market Value of Portfolio	% of Assets
\$0 to \$1,000,000	0.95%
\$1,000,001 to \$4,000,000	0.80%
\$4,000,001 and over	0.65%

OWM's annual investment advisory fee shall include investment advisory services, and, to those who avail themselves, financial planning and consulting services. There is no additional charge for these services.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

**B.** OWM shall deduct fees and/or bill Clients quarterly, based upon the market value of the assets as measured by the average daily balance during the quarter. Clients may elect to have OWM's advisory fees deducted from their account[s] at the Custodian. Both OWM's Investment Management & Planning Agreement and the custodial/clearing agreement may authorize the Custodian to debit the account[s] for the amount of OWM's investment advisory fee and to directly remit that management fee to OWM in compliance with regulatory procedures. Clients provide written authorization permitting advisory fees to be deducted by OWM to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian. In the rare event that OWM bills the Client directly, payment is due upon receipt of OWM's invoice.

**C.** OWM shall generally recommend that Charles Schwab and Co., Inc. ("Schwab") serve as the broker-dealer/custodian (herein collectively the "Custodian") for Client investment management assets. In its capacity as a broker-dealer, Schwab will charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds), commissions are charged for individual equity and fixed income securities transactions), as applicable. Schwab does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Schwab's brokerage requirements. However, Schwab typically charges for mutual funds and other types of investments. In addition to OWM's investment management fee, brokerage commissions and/or transaction fees, Clients will also incur, relative to all mutual fund and ETF purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). When beneficial to the Client, individual debt and/or equity transactions may be effected through broker-dealers with whom OWM and/or the Client have entered into arrangements for prime brokerage clearing services, including effecting certain Client transactions through SEC registered and FINRA member broker-dealers, including Arkadios Capital (in which event, the Client shall incur both the transaction fee charged by the executing broker-dealer and a "trade away" fee charged by Schwab).

**D.** OWM's annual investment advisory fee shall be paid quarterly, based upon the market value of the assets as measured by the average daily balance during the quarter. The Investment Management & Planning Agreement between OWM and the Client will continue in effect until terminated by either party by written notice in accordance with the terms of the Investment Management & Planning Agreement. The Client's Investment Management & Planning Agreement with the Advisor is non-transferable without the Client's prior consent.

**E.** Neither OWM, nor its representatives accept compensation from the sale of securities, insurance or other investment products.

## Item 6 Performance-Based Fees and Side-by-Side Management

Neither OWM nor any supervised person of OWM accepts performance-based fees. OWM does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## Item 7 Types of Clients

OWM's Clients shall generally include individuals, business entities, retirement plans, trusts, estates and charitable organizations. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. OWM generally requires a minimum relationship size of \$500,000 for AUM based services. Clients who do not meet the required minimum relationship size, may engage the Advisor under a fixed retainer agreement.

## Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

OWM may utilize the following methods of security analysis:

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

OWM may utilize the following investment strategies when implementing investment advice given to Clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

**Please Note: Investment Risk.** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by OWM) will be profitable or equal any specific performance level(s).

**A.** OWM's methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis, OWM must have access to current/new market information. OWM has no control over the dissemination rate of market information; therefore, unbeknownst to OWM, certain analyses may be compiled with outdated market information, severely limiting the value of OWM's analysis.

Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

OWM's primary investment strategies - Long Term Purchases and Short Term Purchases are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially

develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Clients should also consider the following risks:

Market Risks- The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks- The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks- The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**B.** Currently, OWM primarily allocates Client investment assets among various individual equity (stocks), debt (bonds) and fixed income securities, mutual funds and/or exchange traded funds ("ETFs") on a discretionary basis in accordance with the Client's designated investment objective(s).

## Item 9 Disciplinary Information

**OWM has not been the subject of any disciplinary actions.**

## Item 10 Other Financial Industry Activities and Affiliations

**A.** Neither OWM, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

**B.** Neither OWM, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

**C.** OWM has no other relationship or arrangement with a related person that is material to its advisory business.

**D.** OWM does not recommend or select other investment advisors for its Clients.

## Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

**A.** OWM maintains an investment policy relative to personal securities transactions. This investment policy is part of OWM's overall Code of Ethics, which serves to establish a standard of business conduct for all of OWM's representatives (herein "Supervised Persons") that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request. In accordance with Section 204A of the Investment Advisers Act of 1940, OWM also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by OWM or any person associated with OWM.

**B.** Neither OWM nor any Supervised Persons of OWM recommends, buys, or sells for Client accounts, securities in which OWM or any related person of OWM has a material financial interest.

**C.** OWM has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of OWM's "Access Persons", which is defined under OWM's Code of Ethics. OWM's securities transaction policy requires that an Access Person of OWM must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten(10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date OWM selects. OWM also requires transactions reports to be reported to the Chief Compliance or his/her designee on a quarterly basis.

**D.** OWM and/or Supervised Persons of OWM may buy or sell securities, at or around the same time as those securities are recommended to Clients. This practice creates a situation where OWM and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11.C, OWM has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of OWM's Access Persons.

## Item 12 Brokerage Practices

**A.** OWM does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize OWM to direct trades to the Custodian as agreed in the Investment Management & Planning Agreement. OWM generally recommends that investment management accounts be maintained at Schwab. Prior to engaging OWM to provide investment management services, the Client will be required to enter into a formal Investment Management & Planning Agreement with OWM setting forth the terms and conditions under which OWM shall manage the Client's assets, and a separate custody/clearing agreement with each designated broker-dealer/custodian.

Factors that OWM considers in recommending Schwab (or any other broker-dealer/custodian to Clients) include historical relationship with OWM, financial strength, reputation, execution capabilities, pricing, research, and service. Clients are not obligated to use the Custodian recommended by OWM and will not incur any extra fee or cost associated with using a custodian not recommended by OWM. However, OWM may be limited in the services it can provide if the recommended Custodian is not engaged. Although the commissions and/or transaction fees paid by OWM's Clients shall comply with OWM's duty to obtain best execution, a Client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where OWM determines, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker- dealer services,



including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although OWM will seek very competitive rates, it may not necessarily obtain the lowest possible commission rates for Client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, OWM's investment management fee. OWM's best execution responsibility is qualified if securities that it purchases for Client accounts are mutual funds that trade at net asset value as determined at the daily market close.

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. OWM does not participate in soft dollar programs sponsored or offered by any broker-dealer.

**2.** OWM does not receive referrals from broker-dealers or custodians.

**3.** OWM does not generally accept directed brokerage arrangements (when a Client requires that account transactions be effected through a specific broker-dealer). In such Client directed arrangements, the Client will negotiate terms and arrangements for their account with that broker-dealer, and OWM will not seek better execution services or prices from other broker-dealers or be able to "batch" the Client's transactions for execution through other broker-dealers with orders for other accounts managed by OWM. As a result, Client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. OWM will not engage in any principal transactions (i.e., trading a security from or to OWM's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account).

**Please Note:** In the event that the Client directs OWM to effect securities transactions for the Client's accounts through a specific broker-dealer, the Client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the Client determined to effect account transactions through alternative clearing arrangements that may be available through OWM.

**OWM's Chief Compliance Officer, Anthony Ogorek, remains available to address any questions that a Client or prospective client may have regarding the above arrangement.**

**B.** To the extent that OWM provides investment management services to its Clients, the transactions for each Client account generally will be effected independently, unless OWM decides to purchase or sell the same securities for several Clients at approximately the same time. OWM may (but is not obligated to) combine or "bunch" such orders into a block trade to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among OWM's Clients' differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among Clients in proportion to the purchase and sale orders placed for each Client account on any given day. OWM shall not receive any additional compensation or remuneration as a result of such aggregation.

## Item 13      Review of Accounts

**A.** For those Clients to whom OWM provides investment supervisory services, account reviews are conducted on an ongoing basis by OWM's Principals and/or representatives. All investment supervisory Clients are advised that it remains their responsibility to advise OWM of any changes in their investment objectives and/or financial situation. All Clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with OWM on an annual basis.

**B.** OWM may conduct account reviews on an other-than-periodic basis upon the occurrence of a triggering event, such as a change in Client investment objectives and/or financial situation, market corrections and Client request.

**C.** On a monthly basis Clients are provided with written summary account statements directly from the broker-dealer/custodian for the Client's accounts. Written trade confirmation statements are provided shortly (generally within a day or two) after trades are made. OWM may also provide a written quarterly report summarizing account activity and performance for the prior quarter.

## Item 14 Client Referrals and Other Compensation

**A.** OWM has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like OWM. As a registered investment advisor participating on the Schwab Advisor Services platform, OWM receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware; however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

**Services that Benefit the Client** – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, tax reporting to the IRS, facilitation of money movement and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

**Services that May Indirectly Benefit the Client** – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

**Services that May Only Benefit the Advisor** – Schwab also offers other services to OWM that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates an incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. OWM believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

OWM's Clients do not pay more for investment transactions effected and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by OWM to Schwab or any other entity to invest any specific amount or percentage of Client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**B.** OWM does not compensate, directly or indirectly, any person, other than its representatives, for Client referrals.

**OWM's Chief Compliance Officer, Anthony Ogorek, remains available to address any questions that a Client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.**

## Item 15 Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over Client funds and/or securities. In other words, custody is not limited to physically holding Client funds and securities. If an investment adviser has the ability to access or control Client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

We have established procedures to ensure all Client funds and securities are held at a qualified custodian in a separate account for each Client under that Client's name. Clients or an independent representative of the Client are also notified in writing of the qualified custodian's name, address and the manner in which the funds or securities are maintained, promptly when the account is opened and following any changes. Account statements are delivered directly from the qualified custodian to each Client, or the Client's independent representative (other than the Adviser affiliated trustee), at least quarterly. Additionally, OWM may be deemed to have custody for accounts where they are authorized to directly deduct OWM's fees from the Client account. Finally, accounts managed by OWM are subject to an annual surprise verification examination conducted by a third-party, independent accounting firm.

### **Internal Control Reporting**

Based on the SEC's definition of custody, OWM is deemed to have custody over accounts managed by OWM. For these accounts, OWM has established the following procedures to comply with the SEC's Custody Rule:

- All Client funds and securities are held at Schwab Institutional, which serves as the qualified custodian, in a separate account for each Client under that Client's name.
- Clients or an independent representative of the Client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained.
- Account statements are delivered directly from Schwab Institutional to each Client, or the Client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from OWM. When Clients have questions about their account statements, they should contact OWM or the qualified custodian preparing the statement.

In accordance with SEC regulations, OWM is subject to an annual surprise verification examination.

OWM must engage an independent, third-party accounting firm to perform an annual, surprise examination verifying the location of Client funds and securities. When completed, the accounting firm's report will be available through the SEC's Investment Adviser Public Disclosure page at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 105707.

**Please Note:** To the extent that OWM provides Clients with periodic account statements or reports, the Client is urged to compare any statement or report provided by OWM with the account statements received from the account custodian. Additionally, the account custodian does not verify the accuracy of OWM's advisory fee calculation.

## Item 16 Investment Discretion

The Client can determine to engage OWM to provide investment advisory services on a discretionary basis. Prior to OWM assuming discretionary authority over a Client's account, the Client shall be required to execute an Investment Management Agreement & Planning Agreement, naming OWM as the Client's attorney and agent in fact, granting OWM discretionary authority to buy, sell, or otherwise effect investment transactions involving the assets in the Client's name found in the account.

Clients who engage OWM on a discretionary basis may, at any time, impose restrictions, in writing, on OWM's discretionary authority. (i.e. limit the types/amounts of particular securities purchased for their account or limit or proscribe OWM's use of margin, etc.).

## Item 17 Voting Client Securities

- A.** OWM does not accept proxy-voting responsibility for Clients. Clients maintain exclusive responsibility for:
1. Directing the manner in which proxies solicited by issuers of securities owned by the Client shall be voted,
  2. Making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the Client's investment assets. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact OWM to discuss any questions they may have with a particular solicitation.

## Item 18 Financial Information

**A.** OWM does not solicit fees of more than \$1,200, per Client, for services to be completed six months or more in advance.

**B.** OWM is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain Client accounts.

**C.** OWM has not been the subject of a bankruptcy petition.

**ANY QUESTIONS: OWM's Chief Compliance Officer, Anthony Ogorek, remains available to address any questions that a Client or prospective client may have regarding the above disclosures and arrangements.**

**Important Disclosures-**

We do not serve as an attorney, accountant, or insurance agency, and no portion of our services should be construed as legal, accounting or implementation services. Accordingly, we do not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc). Clients are reminded that they are under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation that we make. OWM does not make any presentations or warranties as to the accuracy, timeliness, suitability, completeness or relevance of any information prepared by an unaffiliated third party, whether linked to OWM or its website incorporated herein and takes no responsibility therefore. All such information is provided solely for convenience purposes only and all users should be guided accordingly.

Certain portions of OWM's web site (i.e. Newsletters, articles, commentaries, etc.) may contain a discussion of, and/or provide access to, OWM's (and those of other investment and non-investment professionals) positions and/or recommendations as of a specific prior date. Due to various factors, including changing market conditions, such discussion may no longer be reflective of current position(s) and/or recommendation(s). Moreover, no client or prospective client should assume that any such discussion serves as the receipt of, or a substitute for, personalized advice from OWM, or from any other investment professional.

## Form ADV Part 2B – Individual Disclosure Brochures

Anthony J. Ogorek, CFP®

### Brochure Supplement Dated: March 4, 2021

Contact: Anthony Ogorek, Owner/Chief Compliance Officer/Chief Financial Strategist  
Sheridan Meadows Corporate Park  
6400 Sheridan Drive, Suite 224  
Williamsville, New York 14221

This Form ADV2B (“Brochure Supplement”) supplement provides information about Anthony J. Ogorek that supplements the Ogorek Wealth Management LLC Disclosure Brochure. You should have received a copy of the Disclosure Brochure. Please contact Anthony Ogorek, Chief Compliance Officer, if you did not receive Ogorek Wealth Management’s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Anthony J. Ogorek is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### Item 2 Education Background and Business Experience

Anthony J. Ogorek, CFP®, was born in 1954. Mr. Ogorek graduated from Rosary Hill College in 1976, with a BM degree in Composition. He graduated from Daemen College in 1978, with a BS degree in Education. Mr. Ogorek graduated from SUNY at Buffalo in 1978, with a MA degree in Composition. He graduated from SUNY at Buffalo in 1981, with an Ed.D. degree in Curriculum Planning. Mr. Ogorek has been employed as an investment adviser representative of Ogorek Wealth Management LLC since January 1, 2002.

Mr. Ogorek became a Certified Financial Planner (CFP®) in June 1983. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

**1. Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

**2. Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances.

**3. Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).

**4. Ethics** – Agree to be bound by CFP® Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

**1. Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

**2. Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3 Disciplinary Information

None.

### Item 4 Other Business Activities

**A.** Mr. Ogorek is not actively engaged in any other investment-related businesses or occupations.

**B.** Mr. Ogorek is not actively engaged in any non-investment-related business or occupation for compensation.

### Item 5 Additional Compensation

None.

### Item 6 Supervision

OWM has and provides investment advisory and supervisory services in accordance with OWM’s policies and procedures manual. The primary purpose of OWM’s Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser’s Act (“*Advisers Act*”). OWM’s Chief Compliance Officer, Anthony Ogorek, is primarily responsible for implementation of OWM’s policies and procedures. Should an employee or investment adviser representative of OWM have any questions regarding the applicability/relevance of the *Advisers Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Mr. Ogorek can be reached at (716) 626-5000.

**Jeffrey H. Viksjo, CFA®****Brochure Supplement Dated: March 4, 2021**

Contact: Anthony Ogorek, Owner/Chief Compliance Officer/Chief Financial Strategist  
Sheridan Meadows Corporate Park  
6400 Sheridan Drive, Suite 224  
Williamsville, New York 14221

This Form ADV2B (“Brochure Supplement”) provides information about Jeffrey H. Viksjo that supplements the Ogorek Wealth Management LLC Disclosure Brochure. You should have received a copy of the Disclosure Brochure. Please contact Anthony Ogorek, Chief Compliance Officer if you did not receive Ogorek Wealth Management’s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Jeffrey Viksjo is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 Education Background and Business Experience**

Jeffrey H. Viksjo, CFA®, was born in 1984. Mr. Viksjo graduated from Canisius College in 2006, with a Dual Major in Finance and Economics. Mr. Viksjo has been employed as Investment Analyst of Ogorek Wealth Management LLC since May 2017. Prior to working for OWM, Mr. Viksjo worked for Key Bank as Vice President, Corporate Strategy.

Mr. Viksjo became a Chartered Financial Analyst (CFA®) in September 2010. The Chartered Financial Analyst (“CFA”) charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. CFA® is a trademark owned by CFA Institute.

**Item 3 Disciplinary Information**

**None.**

**Item 4 Other Business Activities**

- A.** The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B.** The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

**None.**



## Item 6      Supervision

OWM has and provides investment advisory and supervisory services in accordance with OWM's policies and procedures manual. The primary purpose of OWM's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Advisers Act"). OWM's Chief Compliance Officer, Anthony Ogorek, is primarily responsible for implementation of OWM's policies and procedures. Should an employee or investment adviser representative of OWM have any questions regarding the applicability/relevance of the Advisers Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Mr. Ogorek can be reached at (716) 626-5000.

## Justin Chatelle

### **Brochure Supplement Dated: March 4, 2021**

Contact: Anthony Ogorek, Owner/Chief Compliance Officer/Chief Financial Strategist  
Sheridan Meadows Corporate Park  
6400 Sheridan Drive, Suite 224  
Williamsville, New York 14221

This Form ADV2B (“Brochure Supplement”) provides information about Justin Chatelle that supplements the Ogorek Wealth Management LLC Disclosure Brochure. You should have received a copy of the Disclosure Brochure. Please contact Anthony Ogorek, Chief Compliance Officer if you did not receive Ogorek Wealth Management’s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Justin Chatelle is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### Item 2 Education Background and Business Experience

Justin Chatelle was born in 1996. Mr. Chatelle graduated from Canisius College in 2018, with a Dual Major in Finance and Economics. Mr. Chatelle has been employed as a Financial Advisor Associate of Ogorek Wealth Management LLC since May 2018.

### Item 3 Disciplinary Information

**None.**

### Item 4 Other Business Activities

- A.** The supervised person is not actively engaged in any other investment-related businesses or occupations.
- B.** The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

### Item 5 Additional Compensation

**None.**

### Item 6 Supervision

OWM has and provides investment advisory and supervisory services in accordance with OWM’s policies and procedures manual. The primary purpose of OWM’s Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Adviser’s Act (“*Advisers Act*”). OWM’s Chief Compliance Officer, Anthony Ogorek, is primarily responsible for implementation of OWM’s policies and procedures. Should an employee or investment adviser representative of OWM have any questions regarding the applicability/relevance of the *Advisers Act*, the Rules there under, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Mr. Ogorek can be reached at (716)626-5000.



## Privacy Policy

Dated: March 4, 2021

**Ogorek Wealth Management, LLC**  
**6400 Sheridan Drive, Suite 224**  
**Williamsville, NY 14221**  
**Phone: (716) 626-5000 • Fax: (716) 626-5509**  
**<http://www.ogorek.com>**

**CRD No: 105707**

## Privacy Policy

### Our Commitment to You

Ogorek Wealth Management, LLC ("OWM" or the "Advisor") is committed to safeguarding the use of your personal information that we possess as your Investment Advisor.

OWM (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we possess and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust.

OWM does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

### What do you need to know?

Registered Investment Advisors ("RIAs") share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

#### 1. What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

#### 2. What sources do we collect information from in addition to you?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

#### 3. How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, a firewall barrier, as well as secure file encryption and locked office buildings. Our employees are advised about OWM's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements, including strict confidentiality.

#### 4. How we share your information?

RIAs do need to share personal information regarding their clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Sharing	Limitations
<p style="text-align: center;"><b>Servicing our Clients</b></p> <p>We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed-upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>	OWM may share this information.	Clients cannot limit the Advisor's ability to share.
<p style="text-align: center;"><b>Administrators</b></p> <p>We may disclose your non-public personal information to companies we hire to help administer our business. Companies that we hire to provide services of this nature are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	OWM may share this information.	Clients cannot limit the Advisor's ability to share.
<p style="text-align: center;"><b>Marketing Purposes</b></p> <p>OWM does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where OWM or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.</p>	OWM does not share personal information.	Clients cannot limit the Advisor's ability to share.
<p style="text-align: center;"><b>Authorized Users</b></p> <p>In addition, your non-public personal information may also be disclosed to you and persons that we believe to be your authorized agent or representative.</p>	OWM does share personal information.	Clients can limit the Advisor's ability to share.
<p style="text-align: center;"><b>Information About Former Clients</b></p> <p>OWM does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p>	OWM does not share personal information regarding former clients	Clients can limit the Advisor's ability to share.

#### 5. How can you limit sharing?

You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, e-mail, or in person.

#### Changes to our Privacy Policy

We will send you a notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (716) 626- 5000 or via email at [tony@ogorek.com](mailto:tony@ogorek.com).